

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
SAN ANGELO DIVISION

STUART GOODNER AND LISA GOODNER,)
INDIVIDUALLY AND AS LEGAL HEIRS OF)
THE ESTATE OF SARAH GOODNER,)
DECEASED, AND AS NEXT FRIENDS TO)
R. G., A MINOR,)

Plaintiffs,)

VS.)

HYUNDAI MOTOR COMPANY, LTD.)
AND HYUNDAI MOTOR AMERICA,)

Defendants.)

CIVIL ACTION NO. 6:08-CV-078-C

DEFENDANT HYUNDAI MOTOR COMPANY'S PRE-TRIAL DISCLOSURES

COMES NOW defendant Hyundai Motor Company ("Hyundai"), defendant in the above-styled and numbered cause, by and through undersigned counsel, and, pursuant to the Pretrial Notice and Order entered by the Court on September 1, 2009, and files this, its Pre-Trial Disclosures. Hyundai provides the following information required by Fed. R. Civ. P. 26(a)(3):

- (A) the name and, if not previously provided, the address and telephone number of each witness, separately identifying those whom the party expects to present and those whom the party may call if the need arises;
- (B) the designation of those witnesses whose testimony is expected to be presented by means of a deposition and, if not taken stenographically, a transcript of the pertinent portions of the deposition testimony; and
- (C) an appropriate identification of each document or other exhibit, including summaries of other evidence, separately identifying those which the party expects to offer and those which the party may offer if the need arises.

A. Hyundai's Witness/Deposition List

I.

Hyundai will call the following retained experts to offer opinion testimony at the trial of this matter:

Dr. Robert Banks, Biodynamic Research, San Antonio, Texas, biomechanics, injury mechanisms and occupant kinematics, rebuttal of plaintiffs' experts

Dr. Alan Dorris, Dorris & Associates, Atlanta, Georgia, product safety, human factors and ergonomics, warnings and communications pertaining to product safety, rebuttal of plaintiffs' experts

Mike Klima, Design Research Engineering, Novi, Michigan, vehicle restraint systems including vehicle assembly, design, testing, occupant kinematics, field and accident investigation and reconstruction, literature review, statistics review, condition, design and performance of the restraint system in the subject vehicle and rebuttal of plaintiffs' experts

II.

Hyundai may call the following retained experts to offer opinion testimony at the trial of this matter:

Mark Leonard, Vehicle Sciences, Peoria, Arizona, his opinions and analysis of the accident in question, accident investigation and reconstruction and rebuttal of plaintiffs' experts

III.

Hyundai may call one or more of the following witnesses either live or by deposition testimony:

Rebekah Goodner, Lubbock, Texas, vehicle driver

Stuart Goodner, Monument, Colorado, plaintiff

Lisa Goodner, Monument, Colorado, plaintiff

Linda J. Chantaca, fact witness

Trooper Wm. Karl Keese, Texas DPS, Brownwood, Texas, accident investigation and reconstruction

Trooper Gerald Salas, Texas DPS, Brownwood, Texas, accident investigation, records

Steve Johnson, National Manager, Design Analysis and Engineering, Hyundai Motor America, vehicle design

IV.

In addition, Hyundai may also call various records custodian by and through their depositions on written questions, which were previously filed with court, including but limited to the following:

Margaret Benson, custodian of records from Shannon Medical Center
Gerald P. Salas, custodian of records for Texas Department of Public Safety
Phil Long Hyundai custodian of records (name illegible)
Rudy Lara, custodian of records of Ballinger Auto Tech & Tire
Diana L. Swank, custodian of records for USAA Mutual Insurance Company
Bruce Winkanwedor, custodian of records of Huffines Hyundai

Hyundai reserves the right to cross examine any witness called by plaintiffs.

B. Hyundai's Page/Line Designation

Linda Chantaca

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4/18 – 5/3
8/24 – 10/13
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13/1 – 13/3
13/17 – 14/3
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14/12 – 14/23
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16/2 – 16/8
17/3 – 17/20
25/11 – 26/25
29/11 – 29/18

Rebekah Goodner

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Trooper William Karl Keesee

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Trooper Gerald Salas

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 73/2 – 73/9

C. Hyundai's Pre-Trial Exhibit List

| Exhibit No. | Description | May Use | Will Use |
|-------------|---|---------|----------|
| 1. | Mark Leonard curriculum vitae | X | |
| 2. | Accident Report | | X |
| 3. | Police Scene Photographs | | X |
| 4. | Scene Diagram – scale with evidence | X | |
| 5. | Scene Diagram - with police identificaton | X | |
| 6. | Scene Diagram - with scaled vehicle | X | |
| 7. | Scene Diagram - with distances | X | |
| 8. | Scene Diagram - with roll distances | X | |

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| 9. | SAE Paper 890857- Reconstruction of Rollover Collisions, Orłowski and Moffatt | X | |
| 10. | SAE Paper 960647-A Primer on the Reconstruction and Presentation of Rollover Accidents, Martinez and Schlueter | X | |
| 11. | SAE Paper 2008-01-0156 – Rollover Crash Tests on Dirt: An Examination of Rollover Dynamics, Luepke, Carger, Germane | X | |
| 12. | SAE Paper 2008-01-0172-Rollover Dynamics: An Exploration of the Fundamentals, Carter, Luepke, Germane | X | |
| 13. | M. Leonard Calculations | X | |
| 14. | VSI Scene Photographs (8/7/08) | X | |
| 15. | VSI Vehicle Photographs (08/21/08) | X | |
| 16. | VSI Vehicle Photographs (06/06/09) | X | |
| 17. | Mike Klima - curriculum vitae | | X |
| 18. | Accident Seat Belt Assemblies | | X |
| 19. | Exemplar Seat Belt Assemblies | | X |
| 20. | FMVSS Code of Federal Regulations Part 571.207 | X | |
| 21. | FMVSS Code of Federal Regulations Part 571.208 | X | |
| 22. | FMVSS Code of Federal Regulations Part 571.209 | X | |
| 23. | FMVSS Code of Federal Regulations Part 571.210 | X | |
| 24. | FMVSS Code of Federal Regulations Part 571.216 | X | |
| 25. | Model exemplar vehicle | | X |
| 26. | 2005 Hyundai Tucson Owner's Manual, Handbook, and Supplement | X | |
| 27. | Hyundai Airbag Safety brochure, hangtag, and warnings | X | |
| 28. | Definition of "minimum performance standards" within the meaning of the Federal Motor Vehicle Safety Standards by James B. Gregory, Administrator, National Highway Traffic Safety Administration. Published at Docket No. 75-7; Notice 02; Federal Register, Vol. 41, No. 11, p. 2392, 1/16/76. | | X |
| 29. | Inspection Notes for Inspection of October 16, 2008 | X | |
| 30. | Inspection Photographs of October 16, 2008 | | X |
| 31. | Inspection Photographs for Surrogate Analysis of May 8, 2009 | | X |
| 32. | Inspection Photographs for Ford Vehicles with Surrogate of March 12, 2010 | | X |
| 33. | Chart: Vehicle Miles Traveled by Year | | X |
| 34. | Chart: Motor Vehicle Fatalities by Year | | X |
| 35. | Chart: Motor Vehicle Fatality Rate by Year | | X |
| 36. | Chart: Driver Seat Belt Usage Rates | | X |
| 37. | Chart: Cumulative Roll Count Distributions in Single Vehicle Rollover Accidents | | X |

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| 38. | Chart: Current Status of 2000 Model Year Vehicles with Front Integrated Seats (and back up materials) | | X |
| 39. | Chart: Risk of Total Ejection by Restraint Use (NASS GES 1995-2004 Ejection Analysis); and backup materials (methods) | | X |
| 40. | Chart: Vehicle Models Introduced in 2005 - Presence of SIR (and backup materials) | | X |
| 41. | Excerpt from Safercar.gov entitled, "Rollover – Minimize Risk and Injury" | | X |
| 42. | Bready, J., Nordhagen, R., Kent, R. and Jakstis, M., "Characteristics of Seat Belt Restraint System Markings", Paper No. 2000-01-1317, Society of Automotive Engineers, 2000 | X | |
| 43. | Bready, J., Nordhagen, R. and Kent, R., "Seat Belt Survey: Identification and Assessment of Noncollision Markings", Paper No. 1999-01-0441, Society of Automotive Engineers, 1999 | X | |
| 44. | Heydinger, G.J., Uhlenhake, G. D., Guenther, D. A., Dunn, A. L., "Comparison of Collision and Noncollision Marks on Vehicle Restraint Systems", Paper No. 2008-01-0160, Society of Automotive Engineers, 2008 | X | |
| 45. | Moffatt, C.A., Moffatt, E.A., and Weiman, T.R., "Diagnosis of Seat Belt Usage in Accidents", Paper No. 840396, Society of Automotive Engineers. February 1984 | X | |
| 46. | Padmanaban, J. and Burnett, R., "Seat Integrated and Conventional Restraints: A Study of Crash Injury/Fatality Rates in Rollovers", 52 nd Annual AAAM, 2008 | X | |
| 47. | Thomson, R., Romilly, D., Navin, F., Macnabb, M., "Dynamic Requirements of Automotive Seatbacks", Paper No. 930349, Society of Automotive Engineers, 1993 | X | |
| 48. | Klima, M., Toomey, D., Weber, M., "Seat Belt Retractor Performance Evaluation in Rollover Crashes", Paper No. 2005-01-1702, Society of Automotive Engineers, 2005 | X | |
| 49. | Toomey, D., Klima, M., Cooper, E., "Evaluation of Seat Belt Assembly Physical Evidence in Properly Functioning and Intentionally Disabled Retractor Demonstrations", Paper No. 2009-01-1245, Society of Automotive Engineers, 2009 | X | |
| 50. | General Motors Press Release and Web Content Literature regarding ABTS | X | |
| 51. | Exponent Dolly Rollover Test and Video - PH09107 (Viggiano v Ford, 2000 Lincoln Navigator) | X | |
| 52. | Survey Report - 2004-DRE-101NS - Seat Back Angle Survey | X | |

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| 53. | Test Report and Videos - 2006-DRE-102PT - Demonstration of Seatbelt Retractor Performance in a Rollover Environment | X | |
| 54. | Test Report and Videos - 2007-DRE-102PT - Demonstration of Seatbelt Retractor Performance in a Rollover Environment | X | |
| 55. | Test Report and Videos - 2007-DRE-111PT - Demonstration of Seatbelt Retractor Performance in a Rollover Environment | X | |
| 56. | Allan Dorris – curriculum vitae | | X |
| 57. | Effectiveness of Warning Labels and Signs: An Update on Compliance Research, T. Ayers, et al | | X |
| 58. | Human Factors in the Design of Effective Product Warnings, by Alan Dorris | | X |
| 59. | Judgments of Risk Associated with Riding with a Reclined Seat in an Automobile, T. Rhoades, et al | | X |
| 60. | Mandatory Air Bag Warnings: A Human Factors Analysis of their Development, by Alan and Nathan Dorris | | X |
| 61. | On the Reading of Product Owner's Manuals: Perceptions and Product Complexity, Mehlenbacher, et al | | X |
| 62. | Potential Problems Associates with Overusing Warnings, Frantz, et al | | X |
| 63. | Product Information Presentation, User Behavior and Safety, McCarthy, et al | | X |
| 64. | Consumer Product Warnings: Review and Analysis of Effectiveness Research, DeJoy, et al | | X |
| 65. | Supporting the Warning Designer: An Automotive Case Study, Alan and Nathan Dorris | | X |
| 66. | Warning Research: An Integrative Perspective, Rogers, et al | | X |
| 67. | 2005 Taurus Owner's Guide (selected pages) | | X |
| 68. | 2005 Owner's Manual Accord Sedan (selected pages) | | X |
| 69. | 2005 911 Carrera Owner's Manual (selected pages) | | X |
| 70. | 2005 Passat Owner's Guide (selected pages) | | X |
| 71. | Survey of 2003 Model Year Vehicles: Seat Recline Warnings, Erwin | | X |
| 72. | Notice of Equipment Compliance re: "DOT 748, AS-1, M-52", test report date: 10/25/04; notification #040780, 00974857, Confidential | X | |
| 73. | Notice of Equipment Compliance re: "DOT 748, AS-1, M-53", test report date: 10/25/04; notification #040781, Confidential, 00974858 | X | |
| 74. | Test Video DVD, Confidential, 01000937 | X | |
| 75. | Test Video DVD, Confidential, 01000938 | X | |
| 76. | Test Video DVD, Confidential, 01000939 | X | |

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| 77. | Test Video DVD, Confidential, 01000940 | X | |
| 78. | Test Video DVD, Confidential, 01000941 | X | |
| 79. | Test Video DVD, Confidential, 01000942 | X | |
| 80. | Test Video DVD, Confidential, 01000943 | X | |
| 81. | Test Video DVD, Confidential, 01000944 | X | |
| 82. | Test Video DVD, Confidential, 01000945 | X | |
| 83. | Test Video DVD, Confidential, 01000946 | X | |
| 84. | Test Video DVD, Confidential, 01000947 | X | |
| 85. | Engineering Change Order #S2E3013, Confidential, 02000811-812 | X | |
| 86. | Engineering Change Order #S2E4020, Confidential, 02000813-818 | X | |
| 87. | Engineering Change Order #S2E4025, Confidential, 02000819-821 | X | |
| 88. | Engineering Change Order #N2E31024, Confidential, 02001261-1262 | X | |
| 89. | Engineering Change Order #H2E40005, Confidential, 02001262-1265 | X | |
| 90. | Engineering Change Order #H2E40167, Confidential, 02001266-1268 | X | |
| 91. | Engineering Change Order #H2E40416, Confidential, 02001269-1270 | X | |
| 92. | Engineering Change Order #H2E40608, Confidential, 02001271-1273 | X | |
| 93. | Engineering Change Order #H2E40767, Confidential, 02001274-1275 | X | |
| 94. | SGS Test Report No. 62264-04 re: M/N TK-AF6-Z029 installed in the front left hand seats of the Hyundai JM 2004 Model; 4/16/04, Confidential, 02000822-838 | X | |
| 95. | SGS Test Report No. 62271-04 re: M/N TK-AF6-Z030 installed in the front right hand seats of the Hyundai JM 2004 Model; 4/16/04, Confidential, 02000839-855 | X | |
| 96. | SGS Test Report No. 95879-04 re: Automotive Seat Belt Assemblies Model No. TK-ABO-ZO04 which was previously tested under report No. 179711-030 on 11/12/03; 5/21/04, Confidential, 02000856-863 | X | |
| 97. | SGS Test Report No. 179711-03 re: M/N TK-ABO-ZO04 installed in the rear center seat of the Hyundai JM 2004 Model; 11/12/03, Confidential, 02000864-880 | X | |
| 98. | SGS Test Report No. 81005-04 re: Automotive Seat Belt Assemblies Model No. TK-ABO-ZO03- Addendum to SGS U.S. Testing Company Inc. Report no. 179715-030 11/12/03; 4/12/04, Confidential, 02000881-888 | X | |
| 99. | SGS Test Report No. 179715-03 re: M/N TK-ABO-ZO03 installed in the rear left seat of the Hyundai JM 2004 Model; 11/12/03, Confidential, 02000889-905 | X | |

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| 100. | SGS Test Report No. 81008-04 re: Automotive Seat Belt Assemblies Model No. TK-ABO-ZO05- Addendum to SGS U.S. Testing Company Inc. Report no. 179728-03 11/3/03; 4/12/04, Confidential, 02000906-913 | X | |
| 101. | SGS Test Report No. 179728-03 re: M/N TK-ABO-ZO05 installed in the rear right seat of the Hyundai JM 2004 Model; 11/3/03, Confidential, 02000914-930 | X | |
| 102. | FMVSS 207 & ADR 3/02 Vehicle Compliance Testing of Seat Anchorages Hyundai JM 2004 MY (Report No. L4-JM-020; Test Date: 12/26/03-1/16/04; Report Date: 2/18/04), Confidential, 02001276-1324 | X | |
| 103. | FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 20 mph Frontal Impact Test; Report No. L4-JM-060; Test Date: 5/15/04; Report Date: 5/22/04), Confidential, 02001325-1387 | X | |
| 104. | FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 25 mph Frontal Offset Impact Test (Report No. L4-JM-061; Test Date: 4/9/04; Report Date: 4/16/04), Confidential, 02001388-1452 | X | |
| 105. | FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 30 mph Frontal Impact Test (Report No. L4-JM-062; Test Date: 7/17/04; Report Date: 7/24/04), Confidential, 02001453-1517 | X | |
| 106. | FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 20 mph Frontal Impact Test (Report No. L4-JM-063; Test Date: 4/11/04; Report Date: 4/18/04), Confidential, 02001518-1579 | X | |
| 107. | FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 20 mph 30 degrees Driver Side Oblique Impact Test (Report No. L4-JM-064; Test Date: 5/17/04; Report Date: 5/24/04), Confidential, 02001580-1641 | X | |
| 108. | FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 20 mph 30 degree Passenger Side Oblique Impact Test (Report No. L4-JM-065; Test Date: 5/14/04; Report Date: 5/21/04), Confidential, 0201641-1704 | X | |
| 109. | FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 20 mph 30 degree Driver Side Oblique Impact Test (Report No. L4-JM-066; Test Date: 4/19/04; Report Date: 4/26/04), Confidential, 02001705-1767 | X | |
| 110. | FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 30 mph Frontal Impact Test (Report No. L4-JM-068; Test Date: 5/13/04; Report Date: 5/20/04), Confidential, 02001768-1832 | X | |

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| 111. | FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 25 mph Frontal Impact Test (Report No. L4-JM-082; Test Date: 5/19/04; Report Date: 5/26/04), Confidential, 02001833-1894 | X | |
| 112. | FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 25 mph Frontal Impact Test (Report No. L4-JM-083; Test Date: 5/13/04; Report Date: 5/20/04), Confidential, 02001895-1957 | X | |
| 113. | FMVSS 208 Vehicle Compliance Testing of Seat Belt Installation Hyundai JM 2004 MY (Report No. L4-JM-085; Test Date: 5/4/04-5/6/04; Report Date: 5/7/04), Confidential, 02001998-2007 | X | |
| 114. | FMVSS 210 Vehicle Compliance Testing of Seat Belt Assembly Anchorages Hyundai JM 2004 MY (Report No. L4-JM-086; Test Date: 5/11/04-5/12/04; Report Date: 5/13/04), Confidential, 02002008-2041 | X | |
| 115. | F(C)MVSS 216 & GS 39 Vehicle Compliance Testing of Roof Crush Resistance Hyundai JM 2004 MY (Report No. L4-JM-087; Test Date: 3/4/03; Report Date: 4/7/03), Confidential, 02002042-2061 | X | |
| 116. | FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 25 mph 30 Passenger Side Oblique Impact Test (Report No. L4-JM-067; Test Date: 4/27/04; Report Date: 5/4/04), Confidential, 02002790-2852 | X | |
| 117. | JM Int/ext. Package L/Out- top view (large drawing), Confidential, 05180181 | X | |
| 118. | JM Int/ext. Package L/Out – side view (large drawing), Confidential, 05180182 | X | |
| 119. | JM Int/ext. Package L/Out – rear view (large drawing), Confidential, 05180183 | X | |
| 120. | Seat Assy-Frt. Dr's (large drawing), Confidential, 05180184 | X | |
| 121. | Seat Assy-Frt. Dr's (large drawing), Confidential, 05180185 | X | |
| 122. | Seat Assy-Frt. Dr's (large drawing), Confidential, 05180186 | X | |
| 123. | Seat Assy-Frt. Dr's (large drawing), Confidential, 05180187 | X | |
| 124. | Seat Assy-Frt. Dr's (large drawing), Confidential, 05180188 | X | |
| 125. | Seat Belt Assy-Fr P/T 3PT, LH (large drawing), Confidential, 05180189 | X | |

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| 126. | Application for Compliance Notification; Model name/number of device DOT-748 AS-2 M-3.52; Report No. 00440; Report Date: Oct. 19, 2004, Confidential, 02013973 | X | |
| 127. | Test Report (China National Motor Vehicle Safety Glazing Materials Testing Laboratory) Order No. 2-206; Report No. 00440; Date: Oct. 19, 2004, Confidential, 02013974-02013979 | X | |
| 128. | Notice of Equipment Compliance; Notification No. 040785; Test Report Date: Oct. 19, 2004, Confidential, 02013938 | X | |
| 129. | Application for Compliance Notification; Model Name/number of device DOT-748 AS-2 M-3.53; Report No. 00441; Report Date: Oct. 19, 2004, Confidential, 02013980-02013986 | X | |
| 130. | Notice of Equipment Compliance; Notification No. 040786; Test Report Date: Oct. 19, 2004, Confidential, 02013939 | X | |
| 131. | Application for Compliance Notification; Model name/number of device DOT-748 AS-2 M-32; Report No. 00438; Report Date: Oct. 19, 2004, Confidential, 02013966-02013972 | X | |
| 132. | Notice of Equipment Compliance; Notification No. 040783; Test Report Date: Oct. 19, 2004, Confidential, 02013940 | X | |
| 133. | Application for Compliance Notification; Model name/number of device DOT-748 AS-2 M-52; Report No. 00446; Report date: Oct.19, 2004, Confidential, 02013987-02013993 | X | |
| 134. | Notice of Equipment Compliance; Notification No. 040791; Test Report Date: Oct. 19, 2004, Confidential, 02013941 | X | |
| 135. | Application for Compliance Notification; Model name/number of device DOT-748 AS-2 M-53; Report No. 00447; Report date: Oct. 19, 2004, Confidential, 02013994-02014000 | X | |
| 136. | Notice of Equipment Compliance; Notification No.040792; Test Report Date: Oct. 19, 2004, Confidential, 02013942 | X | |
| 137. | Application for Compliance Notification; Model Name/number of device DOT-748 AS-3 M-55; Report No. 00450; Oct. 19, 2004, Confidential, 02014001-02014006 | X | |
| 138. | Notice of Equipment Compliance; Notification No. 040795; Test Report Date: Oct. 19, 2004, Confidential, 02013943 | X | |

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| 139. | Dr. Robert Banks – Curriculum Vitae | | X |
| 140. | Injury Diagram – Sarah Goodner | | X |
| 141. | Injury Diagram – Rebekah Goodner | | X |
| 142. | Occupant movement in rollovers (beachball forms) | | X |
| 143. | Occupant movement in rollovers (figures) | | X |
| 144. | Occupant kinematics charts | | X |
| 145. | Seatbelt-to-seat geometry differences between upright and reclined seatbacks | | X |
| 146. | Driver's manual warning about traveling with seatback in reclined position | | X |
| 147. | Dr. Robert Banks vehicle inspection photographs | | X |
| 148. | Head Injured Patients Who "Talk and Die", D. Davis et al | X | |
| 149. | Occupant Ejection Trajectories in Rollover Crashes: Full Scale Testing and Real World Cases, Funk et al | X | |
| 150. | Response of Reclined Post Mortem Human Subjects to Frontal Impact, Wiechel et al | X | |
| 151. | Rollover Crash Tests – The Influence of Roof Strength on Injury Mechanics | X | |
| 152. | Safety Study – Performance of Lap/Shoulder Belts in 167 Motor Vehicle Crashes | X | |
| 153. | Seat Belt and Car Seat in a Reclined Position: A Dangerous Combination, Rehm, et al | X | |
| 154. | The Effect of Reclined Seats on Mortality in Motor Vehicle Collisions, Dissanaik, et al | X | |
| 155. | Exponent Dolly Rollover Test, 1995 Explorer, TEC 10630, October 24, 2006, test, photographs and video | X | |
| 156. | Exponent Dolly Rollover Test, 2000 Explore, TEC 0805511, September 26, 2008, test report, photographs and video | X | |
| 157. | Accident reconstruction diagram – Banks | X | |
| 158. | USAA records and photographs (deposition by written question) | X | |
| 159. | Shannon Medical Center – Sarah Goodner | X | |
| 160. | Huffines Hyundai (deposition by written question) | X | |
| 161. | Texas Department of Public Safety records (deposition by written question) | | X |
| 162. | Safecar.gov website information on 2005 Hyundai Tucson | X | |
| 163. | FMVSS208 Vehicle Compliance Testing of Seat Belt Installation Hyundai JM 2004MY, Report No. L4-JM-085, May 4-6, 2004, 02001958-1997. | X | |

All exhibits have been numbered and marked with an Exhibit sticker, scanned onto an electronic storage device, and provided to counsel for Plaintiffs.

Respectfully submitted,

GERMER GERTZ BEAMAN & BROWN, L.L.P.
301 Congress Avenue, Suite 1700
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(512) 472-0288 Telephone
(512) 472-0721 Facsimile

By: /s/ Thomas M. Bullion III

Thomas M. Bullion III
State Bar No. 03331005
Chris A. Blackerby
State Bar No. 00787091

ATTORNEYS FOR DEFENDANTS
HYUNDAI MOTOR COMPANY

CERTIFICATE OF SERVICE

I hereby certify that, on the 19th day of March, 2010, I caused to be electronically submitted the foregoing document with the clerk of court for the U.S. District Court Northern District of Texas, using the electronic case files system of the Court. I hereby certify that I have caused all counsel of record to be electronically served via the Court's CM/ECF system.

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